UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA ORANGEBURG DIVISION

MEADWESTVACO CORPORATION, et al.)	
Plaintiffs)	Misc. Case No.
)	
v.)	Subpoena in Civil Action No.
)	1:10-CV-511-GBL-TRJ
REXAM PLC, et al.,)	Pending in the United States
)	District Court for the
Defendants)	Eastern District of Virginia

<u>PLAINTIFFS' [Redacted] MOTION TO COMPEL</u> DOCUMENT PRODUCTION FROM "ABC CORPORATION"

Plaintiffs MeadWestvaco Corporation and MeadWestvaco Calmar, Inc. (collectively, "MWV") hereby file this *redacted* motion to compel compliance with a Rule 45 subpoena directed to "ABC Corporation."

The identity of the subpoenaed third-party who is the subject of this motion has been designated "Highly Confidential" by Defendants Valois of America, Inc. and Valois SAS in the main action pending in the Eastern District of Virginia. Accordingly, throughout this public filing, MWV has identified the subpoenaed third-party as simply "ABC Corporation" and its subsidiary as "ABC Corp. Europe".

Contemporaneously with filing this redacted motion and supporting papers, MWV is filing a motion for leave to file under seal the *unredacted* version of this motion and supporting papers, which identify the subpoenaed third-party who is the subject of this motion. (MWV's Consent Motion for Leave to File under Seal is attached to this motion as the final exhibit.)

For the reasons set forth in the accompanying brief and exhibits thereto, MWV respectfully requests that the Court grant its Motion to Compel.

Dated: January 6, 2011

Respectfully submitted,

MEADWESTVACO CORPORATION MEADWESTVACO CALMAR, INC.

By: /s/ David H. Koysza

David H. Koysza (D.S.C. Id. No. 9893) Martin M. Tomlinson (D.S.C. Id. No. 10869) Wyche Burgess Freeman & Parham, P.A. 44 East Camperdown Way (29601) Post Office Box 728 Greenville, SC 29602-0728 Telephone: (864) 242-8384 Facsimile: (864) 235-8900 E-Mail: dkoysza@wyche.com;

Of counsel:

mtomlinson@wyche.com

Thomas G. Slater, Jr. (VSB No. 05915) Shelley L. Spalding (VSB No. 47112) Hunton & Williams LLP Riverfront Plaza, East Tower 951 East Byrd Street Richmond, Virginia 23219-4074 (804) 788-8200 (804) 788-8218 Fax

Michael P.F. Phelps (VSB No. 45750) Sona Rewari (VSB No. 47327) Hunton & Williams LLP 1751 Pinnacle Drive Suite 1700 McLean, VA 22102 (703)714-7472 (703)714-7410 Fax

Michael A. O'Shea Hunton & Williams LLP 1900 K Street, NW Washington, D.C. 20006-1109 (202) 419-2183 (202) 778-7434 Fax

CERTIFICATE OF CONSULTATION

I hereby certify that counsel for Plaintiffs consulted with counsel for the subpoenaed third-party, ABC Corp., and was not able to resolve this motion.

/s/ David H. Koysza

David H. Koysza (Fed. Id. No. 9893)

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2011, true and correct copies of this motion and supporting documents were served by hand-delivery upon:

William Y. Klett III, Esq. Nexsen Pruet, LLC 1230 Main Street Suite 700 (29201) P.O. Drawer 2426 Columbia, South Carolina 29202 Counsel for ABC Corp.

and by electronic mail and U.S. mail upon the following:

Craig C. Reilly Brendan J. McMurrer

EMAIL: craig.reilly@ccreillylaw.com EMAIL: bmcmurrer@sidley.com

111 Oronoco Street Griffith L. Green

Alexandria, Virginia 22314 EMAIL: ggreen@sidley.com

Tel: 703-549-5354 Sidley Austin LLP Fax: 703-549-2604 1501 K Street, N.W. Counsel for Rexam Beauty Washington, D.C. 20005

and Closures Inc. and Tel: 202-736-8000 Rexam Dispensing Systems SAS Fax: 202-736-8711

Counsel for Valois S.A.S. and

Valois of America, Inc.

/s/ David H. Koysza

David H. Koysza (Fed. Id. No. 9893)